

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Max Kellerman,

Plaintiff,

08 cv 5295 (RJH)

- against -

**MOTION TO ADMIT COUNSEL**

Jon Liebman,

**PRO HAC VICE**

Defendant.

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Herbert M. Wachtell, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

|                   |                                 |
|-------------------|---------------------------------|
| Applicant's Name: | Christina T. Shay               |
| Firm Name:        | Wachtell, Lipton, Rosen & Katz  |
| Address:          | 51 West 52 <sup>nd</sup> Street |
| City/State/Zip:   | New York, NY 10019              |
| Phone Number:     | (212) 403-1000                  |
| Fax Number:       | (212) 403-2000                  |

Christina T. Shay is a member in good standing of the Bar of the State of Illinois.

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There are no pending disciplinary proceeding against Christina T. Shay in any State or Federal court.

Dated: July 1, 2008  
City, State: New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Christina T. Shay', is written over a horizontal line.

Sponsor's  
SDNY Bar (HW-3747)  
Firm Name: Wachtell, Lipton, Rosen & Katz  
Address: 51 West 52<sup>nd</sup> Street  
City/State/Zip: New York, NY 10019  
Phone Number: (212) 403-1000  
Fax Number: (212) 403-2000

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Max Kellerman,

Plaintiff,

08 cv 5295 (RJH)

- against -

Jon Liebman,

Defendant.

**AFFIDAVIT OF  
HERBERT M. WACHTELL  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

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STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF NEW YORK )

Herbert M. Wachtell, being duly sworn, hereby deposes and says as follows:

1. I am a member of the firm of Wachtell, Lipton, Rosen & Katz, counsel for defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit Christina T. Shay as counsel pro hac vice to represent defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on January 5, 1955. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Christina T. Shay since she joined our firm earlier this year.
4. Ms. Shay is an associate at Wachtell, Lipton, Rosen & Katz and is working with me on this matter.
5. I have found Ms. Shay to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Christina T. Shay, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Christina T. Shay, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Christina T. Shay, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: July 1, 2008

City, State: New York, New York

Notarized:



TONI CLARK  
Notary Public, State of New York  
No. 31-7712025  
Qualified in New York County  
Commission Expires December 31, 2010

Respectfully submitted,



Name of Movant: HERBERT M. WACHTELL  
SDNY Bar Code: HW-3747

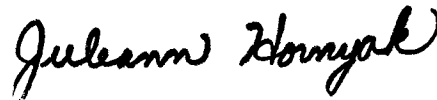
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Christina T. Shay

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on October 6, 2006 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Wednesday, July 02, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Max Kellerman,

Plaintiff,

08 cv 5295 (RJH)

- against -

Jon Liebman,

Defendant.

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**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Herbert M. Wachtell, attorney for Jon Liebman and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

|                   |                                 |
|-------------------|---------------------------------|
| Applicant's Name: | Christina T. Shay               |
| Firm Name:        | Wachtell, Lipton, Rosen & Katz  |
| Address:          | 51 West 52 <sup>nd</sup> Street |
| City/State/Zip:   | New York, NY 10019              |
| Telephone/Fax:    | (212) 403-1131 (212) 403-2000   |
| Email Address:    | CTShay@wlrk.com                 |

is admitted to practice pro hac vice as counsel for Jon Liebman in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: July \_\_, 2008  
New York, NY

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United States District/Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

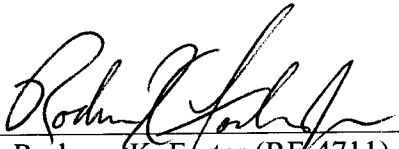
|                |   |                   |
|----------------|---|-------------------|
| -----          | X |                   |
|                | : |                   |
| MAX KELLERMAN, | : |                   |
|                | : |                   |
| Plaintiff,     | : | CIVIL ACTION NO.: |
|                | : |                   |
| v.             | : | CV-08-5295 (RJH)  |
|                | : |                   |
| JON LIEBMAN,   | : | ECF CASE          |
|                | : |                   |
| Defendant.     | : |                   |
|                | : |                   |
| -----          | X |                   |

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of July, 2008, I caused a true and correct copy of the attached Motion for Admission Pro Hac Vice by Defendant Jon Liebman, dated July 3, 2008, to be served upon:

**By Hand Delivery**

Judd Burstein  
JUDD BURSTEIN, P.C.  
1790 Broadway Avenue, Suite 1501  
New York, NY 10019  
(212) 974-2400

  
Rodman K. Forter (RF-4711)